

HISCOCK & BARCLAY^{LLP}

Jerry M. Solomon
Of Counsel

November 4, 2014

Via Electronic Filing

Hon. John G. Koeltl
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: United States v. Narco Freedom Inc. (14 Civ. 8593)

Dear Judge Koeltl:

As you know, we represent Defendant Narco Freedom, Inc. in the above-referenced proceeding. I write to advise the Court that the United States Attorney has agreed to reschedule the motion calendar in this case while the parties negotiate the terms of the preliminary injunction.

Accordingly, we respectfully request that the hearing currently scheduled for November 12, 2014 be rescheduled to the following week, or as soon thereafter as the Court's calendar will permit. Consequently, we request that the Court extend the paper submission deadlines set forth in the October 29, 2014 Temporary Restraining Order in this case in the same manner, such that the deadline for Defendant Narco Freedom, Inc. and the New York State Attorney General to file and serve responsive papers will be extended from November 5, 2014 to November 12, 2014 and the deadline for the United States to file and serve Reply papers will be extended from November 7, 2014 to November 14, 2014. Assuming the Court is willing to grant this request, the United States and Narco Freedom, Inc. consent to a seven day extension of the aforementioned Temporary Restraining Order to accommodate the adjournment.

No previous requests for extensions have been made.

We appreciate Your Honor's kind consideration and prompt attention to this request.

Respectfully,

/s/ Jerry M. Solomon

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cc: **Via Electronic Filing and Email**

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